IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	
Sunny K. Yee et al.	§	Conf. No.: 7239
	§	
Serial No.: 10/677,002	§	Group Art Unit: 2176
	§	
Filed: October 1, 2003	§	Examiner: Hillery, Nathan
	§	
For: METHOD AND APPARATUS FOR	§	Atty. Docket: 200207281-1/SWA
SUPPORTING PAGE	§	NUHP:0119
LOCALIZATION MANAGEMENT	§	
IN A WEB PRESENTATION	§	
ARCHITECTURE	§	

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41

The Appellants submit this Reply Brief in response to the Examiner's Answer mailed on April 18, 2008, pursuant to 37 C.F.R. § 41.41. Specifically, this Reply Brief addresses the Examiner's response to argument section, which begins on page 10 of the Examiner's Answer. Appellants respectfully request that the Board consider Appellants' complete arguments set forth in the previously filed Appeal Brief along with the following remarks.

Legal Precedent

Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985). Thus, for a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Moreover, the prior art reference also must show the *identical* invention "*in as complete detail as contained in the … claim*" to support a *prima facie* case of anticipation. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989) (emphasis added). Accordingly, Appellants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter.

Deficiencies of the Rejection

After careful review of the Examiner's Answer and particularly the response to argument section beginning on page 10, the Appellants maintain that the Examiner's rejections are generally deficient because the prior art reference does not anticipate all elements of claims 1-27. In particular, Appellants would like specifically address the Examiner's response to the arguments on the following claims:

Independent claims 1, 8, 15, and 18

In the response to Appellants' arguments, the Examiner stated:

> [I]n response to appellant's argument that the references fail to show certain features of appellant's invention, it is noted that the features upon which appellant relies (i.e., selecting a localized page from a plurality of locale-versions of the page, thereby improving the efficiency of creating the pages at development time (p 11)) are not recited in the rejected claim(s). Although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims.

Examiner's Answer, p. 10.

Appellants disagree with the Examiner's characterization of the claim features. Independent claim 8 recites, *inter alia*, "providing a page localization manager that identifies a locale-version of a requested page from a plurality of localized pages." Independent claim 18 recites, *inter alia*, "page localizational control logic stored on the machine readable medium and adapted to identify a localized one of a plurality of localized pages corresponding to a

requested page." While Appellants conceded that the claims use the verb "identify" as opposed to the verb "select," claims 8 and 18 recite identifying either a "locale-version of a requested page from" or a "localized one of" a "plurality of localized pages." Additionally, independent claim 1 recites "select a localized page based on at least one locale parameter," and independent claim 15 recites "means for selecting a localized version of a requested page based on at least one locale parameter." Both claims do recite "select" or "selecting" a "localized page" or a "localized version of a requested page."

The Examiner also stated that the "display pages produced containing localized objects" of Parasnis anticipates "selecting a localized page based on the at least one locale parameter." Examiner's Answer, page 10. Appellants respectfully disagree. Appellants stress that Parasnis displays information in a contrastingly different manner than the present claims. In response to Appellants' argument that Parasnis teaches only a "single set of markup language documents," the Examiner stated that "a single set of documents does not mean that there is only one document, but plural documents in a set as clearly depicted in Figs 2 and 3 and also Figs 5 and 6." *Id*. at pages 10-11. Respectfully, Appellants are not arguing that a "single set of documents" is only *one* document. Appellants are referring to a "single set of documents" *for all languages or locales*. Appellants note this is at least one deficiency of Parasnis that illustrates why Parasnis does not anticipate independent claims 1, 8, 15, and 18. As shown in Parasnis, Figs. 2 and 3 each illustrate *the same set of documents*. In Figs. 2 and 3 of Parasnis, the document "Lobby.htm" is an HTML page containing localized objects. Parasnis, Figs. 2 and 3. In Fig. 2, the localized objects are replaced with English through the use of a Global.js file that contains English phrases for the objects. *Id*. at paragraph [0040]. In Fig. 3, the *same* "Lobby.htm" page is used. Instead, because Fig. 3 illustrates a German context, the Global.js file contains German phrases for the objects. *Id*. at paragraph [0045]. *In both contexts, the lobby.htm page is the same page. There are no localized versions of the lobby.htm page itself*. The only difference is the objects in the page are replaced by English or German settings as described in the Global.js file. As clearly seen in both Fig. 2 and Fig. 3, *lobby.htm is in English in both contexts*. Thus, there is no localized page in Parasnis. This is in contrast to the present claims. For example, Parasnis fails to teach or suggest a "plurality of localized pages" as recited in claims 8 and 18. Further, Parasnis fails to teach or suggest a technique to "select a localized page" as recited in claim 1. Similarly, Parasnis fails to teach or suggest "means for selecting a localized version of a

requested page" as recited in claim 15. Appellants respectfully assert that it is impossible to "identify" or "select" a "localized" or "locale version" of a page using the techniques in Parasnis *if there are no localized or locale-version pages.*

Dependent claims 3, 4, and 5

Dependent claims 3, 4, and 5 recite, respectively, wherein the locale parameter comprises a "country identifier," the locale parameter comprises a "locale variant," and the locale variant comprises a "language dialect identifier."

Appellants assert that Parasnis does not disclose a country identifier, a locale variant, or a language dialect identifier. The Examiner stated that because Parasnis discloses a German presentation that "[c]onsequently, there must be a country identifier to identify that the program or page is defined for a German company." Examiner's Answer, page 11. Appellants disagree. To the extent that a user desires to view a presentation in German, it does not necessarily follow that a country must be identified, only the language. Indeed, there are native German speakers in non-German speaking countries or there may be a German company operating in the U.S., which is an English speaking country. As previously stated, Parasnis does not mention the word "country" anywhere in the specification or claims. There is no mention of identifying a country anywhere in the reference. Thus, Appellants assert that the disclosure of rendering an English lobby page in a different languages as described in Parasnis does not anticipate "the locale parameter comprises a country identifier" as recited in claim 3.

Further, the Examiner cited the disclosure of Microsoft's word processing program in "various dialects" to anticipate the "locale variant" and "language dialect identifier" of claims 4 and 5. Appellants assert that the various dialect or versions of Microsoft's programs do not disclose a "locale parameter." As best understood, and certainly as understood from the brief discussion in Parasnis, Microsoft sells a version of its software for each dialect. There is no need for a "locale parameter," because each version only supports and displays one dialect. As stated in Parasnis, the word processing application program versions "support one of a myriad of different languages...as well as various dialects." This brief statement supports the opposite conclusion reached by the Examiner. At least as disclosed in Parasnis, there is one version of Microsoft's word processing program for each language or dialect. Appellants are

unable to see why a program version, in one language or dialect, would need a "locale parameter" that includes a "locale variant" or a "language dialect identifier." Accordingly, Appellants assert that Parasnis does not anticipate dependent claims 4 and 5.

Dependent claim 12

Claim 12 recites, *inter alia*, "providing a filename format having a basename and at least one locale-identifying extension to the basename." In responding to Appellants' arguments, the Examiner stated that "lines 60-61 of l_status.htm reference an UPDATE_MESG placeholder value that is replaced as defined in a line 23 of global.js (English). In a similar manner with respect to German lobby page 100' (see FIG. 6), the UPDATE_MESG placeholder value in 1 _status.htm is replaced as defined in a line 23 of global.js (German) (paragraph block 0047)." Examiner's Answer, page 14. Appellants assert the Examiner's citation supports the Appellants' arguments, not the Examiner's conclusion. The only filenames listed in the Examiner's citation are "1_status.htm" and "global.js." Neither filename has a "basename" and "at least one locale-identifying extension to the basename." Appellants note that global.js is a standardized filename for JavaScript, and the "(English)" and "(German)" are not part of the filename but indicate which "global.js" the text is referring to (for replacing English objects or for replacing German objects). Thus, Appellants assert that Parasnis does not anticipate dependent claim 12.

Dependent claim 13

Claim 13 recites, *inter alia*, "providing a layout mapping that identifies a locale-version of a layout for the requested page from a plurality of localized layouts." In responding to Appellants' arguments, the Examiner stated that "Parasnis et al. clearly illustrates layouts for the HTML pages in Figs 5 and 6. Style.css associated with the particular GLOBAL.JS — English or German represent localized layouts (paragraph block 0055)." Examiner's Answer, page 14. Appellants note that Figs. 5 and 6 illustrate the *same layout*, and do not illustrate different layouts. Further, although Parasnis discusses the use of stylesheets, such stylesheets do not define a "locale-version of a layout." As illustrated in Figs. 5 and 6 of Parasnis, the same stylesheet "Style.css" is used in both the English and German contexts. Parasnis, paragraph [0065]. Even assuming that the stylesheets control the layout of the displays in Parasnis, the "localization" is always controlled by the Global.js file. For example, as stated in Parasnis:

      The "labeleffect" CSS style rules instruct the browser to display the text in an 11 pixel-size font, using normal weight and 2 pixel spacing, with a white background color, aligned in the center of a box that is one pixel in width. ***Identical stylistic attributes are applied during rendering of a banner 106' corresponding to German Lobby page 100', except that the "Presentation Broadcast" text is now replaced with "Vorstellung Sendung."*** In this manner, each of composite graphics 102 and 102' appear to the viewer to comprise a single graphic object that conveys content in the English and German languages, respectively.

Parasnis, paragraph [0064]. (Emphasis added).

      Thus, as clearly stated in Parasnis, "identical stylistic attributes" are used in both the English and German renderings. The only difference is the text, *not the layout*, pulled from the Global.js file. The "stylistic attributes" are the same, regardless of the language, e.g., locale-version, of the rendered display. Thus, to the extent "stylistic attributes" are assumed to be "layouts," there is not a "locale-version of a layout" identified from "a plurality of localized layouts" in Parasnis. Accordingly, Appellants assert that Parasnis does not anticipate claim 13.

Conclusion

      The foregoing are reiterative or supplemental points regarding the reasons why the pending claims are allowable. Appellants rely upon all of the reasons advanced in the Appeal Brief, and respectfully request that the Board carefully review the claims in view of these arguments and overturn the Examiner's rejection.

Respectfully submitted,

Date: June 18, 2008

/Tait R. Swanson/
Tait R. Swanson
Reg. No. 48,226
(281) 970-4545

HEWLETT-PACKARD COMPANY
Intellectual Property Administration
PO Box 272400
Fort Collins, Colorado 80527-2400